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GAVIN NEWSOM, Governor
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June 24, 2019

Manuel Lopez
Department of Toxic Substances Control
9211 Oakdale Avenue
Chatsworth, California 91311
Manuel.Lopez@dtsc.ca.gov

Subject: Kettleman Hills Facility Hazardous Waste Facility Permit Renewal (Project), ENVIRONMENTAL DOCUMENT ANALYSIS

Dear Mr. Lopez:

The California Department of Fish and Wildlife (CDFW) received an Environmental Document Analysis (EDA) from the Department of Toxic Substances Control (DTSC) for the above-referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, construction associated with the Project may be subject to CDFW's Lake and Streambed Alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), related authorization as provided by the Fish and Game Code will be required.

Fully Protected Species: CDFW has jurisdiction over fully protected species of birds, mammals, amphibians, reptiles, and fish, pursuant to Fish and Game Code sections 3511, 4700, 5050, and 5515. CDFW prohibits and cannot authorize take of any fully protected species.

Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include, sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

PROJECT DESCRIPTION SUMMARY

Proponent: Chemical Waste Management Inc.

Objective: Chemical Waste Management Inc. (CWMI) has submitted an application to DTSC for renewal of its Hazardous Waste Facility Permit for the Kettleman Hills Facility (KHF). If approved, the permit would be issued for a 10-year period, with continued authorization if the facility meets certain submittal requirements. The KHF is an active hazardous waste transfer, treatment, storage, and disposal facility that contains several active, inactive, and closed Class I hazardous waste management units as well as Class II/III (non-hazardous) solid waste landfills. CWMI has operated the facility since 1979. The renewed DTSC permit would add new work activities at three existing/permitted operations.

Location: KHF is located in rural western Kings County at 35251 Old Skyline Road, Kettleman City, California 93239.

Timeframe: If granted, the renewed permit would allow CWMI to continue hazardous waste management activities for another 10-year period.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist DTSC in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.

CDFW understands that CWMI is seeking a 10-year permit renewal and that KHF has existing mitigation measures in place to reduce impacts to biological resources, as outlined in its 2009 CEQA document. Currently, the Final Environmental Impact Report (FEIR) indicates that the Project's impacts would be less than significant with the implementation of the mitigation measures described in the FEIR. However, it is unclear whether the mitigation measures described will be enforceable or sufficient in reducing impacts to a level that is less than significant. In particular, CDFW is concerned regarding adequacy of mitigation measures for special-status species including, but not limited to, the State threatened and federally endangered San Joaquin kit fox (*Vulpes macrotis mutica*), the State and federally endangered and State fully protected blunt-nosed leopard lizard (*Gambelia sila*), the State threatened tricolored blackbird (*Agelaius tricolor*), and the State species of special concern burrowing owl (*Athene cunicularia*) and American badger (*Taxidea taxus*).

I. Environmental Setting and Related Impact

Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or United States Fish and Wildlife Service (USFWS)?

COMMENT 1: San Joaquin Kit Fox (SJKF)

Issue: SJKF have been documented to occur both within and in the vicinity of the KHF (CDFW 2019). Review of aerial imagery indicates that the Project area is comprised of and adjacent to annual grassland, a habitat type suitable to support SJKF. SJKF den in right-of-ways, vacant lots, etc., and populations can fluctuate over time. Presence/absence in any one year is not necessarily a reliable indicator for SJKF potential to occur on a site. As a result, there is potential for SJKF to colonize the KHF or to occupy adjacent grassland. CDFW advises that Mitigation Measures (MM) BR-MM.3 through BR-MM.9 be revised to include the following provisions.

Specific impact: Without appropriate avoidance and minimization measures for SJKF, potential significant impacts associated with any vegetation- or ground-disturbing activities include den collapse, inadvertent entrapment, reduced reproductive success, reduction in health and vigor of young, and direct mortality of individuals.

Evidence impact is potentially significant: Habitat loss resulting from agricultural, urban, and industrial development is the primary threat to SJKF (Cypher et al. 2013). Today, very little highly suitable habitat remains in Kings County (Cypher et al. 2013). Therefore, vegetation- or ground-disturbing activities associated with the Project have the potential to significantly impact local SJKF populations.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact)
To evaluate potential impacts to SJKF associated with any vegetation- or ground-disturbing activities, CDFW recommends conducting the following evaluation of the Project area and including the following mitigation measures as conditions of approval.

Recommended Mitigation Measure 1: SJKF Habitat Assessment

CDFW recommends that a qualified biologist conduct a habitat assessment in advance of any vegetation- or ground-disturbing activities to determine if the Project area or its immediate vicinity contains suitable habitat for SJKF.

Recommended Mitigation Measure 2: SJKF Surveys

If suitable habitat is present, CDFW recommends assessing presence/absence of SJKF by conducting surveys following the USFWS' "Standardized recommendations for protection of the San Joaquin kit fox prior to or during ground disturbance" (2011). Specifically, CDFW advises conducting these surveys in all areas of potentially suitable habitat no less than 14-days and no more than 30-days prior to beginning of ground disturbing activities.

Recommended Mitigation Measure 3: SJKF Avoidance

CDFW recommends implementing no-disturbance buffers, as described in the USFWS "Standardized recommendations for protection of the San Joaquin kit fox prior to or during ground disturbance" (2011) around den sites.

Recommended Mitigation Measure 4: SJKF Take Authorization

SJKF detection warrants consultation with CDFW to discuss how to avoid take, or if avoidance is not feasible, to acquire an Incidental Take Permit (ITP) prior to ground-disturbing activities, pursuant to Fish and Game Code Section 2081(b).

COMMENT 2: Blunt-nosed leopard lizard (BNLL)

Issue: BNLL have been documented to occur both on and within the vicinity of the KHF (CDFW 2019). Suitable BNLL habitat includes areas of grassland and upland scrub that contain requisite habitat elements, such as small mammal burrows. BNLL also use open space patches between suitable habitats, including disturbed sites and unpaved access roadways. The FEIR adopted for the Project required that flashing be installed to deter BNLL from entering portions of the Project area, and should an individual be observed in the Project area, a 100-foot buffer be established and CDFW consulted. However, the provisions described in these measures may not be enforceable or adequate in avoiding impacts to BNLL, a Fully Protected Species.

Specific impact: Without appropriate avoidance and minimization measures for BNLL, potentially significant impacts associated with ground-disturbing activities include burrow collapse, nest abandonment, reduced nest success, reduced health and vigor of eggs and/or young, and direct mortality.

Evidence impact is potentially significant: Habitat loss resulting from agricultural, urban, and industrial development is the primary threat to BNLL (ESRP 2018a). Little suitable habitat for BNLL remains in Kings County (USFWS 1998a). Therefore, ground disturbance within the Project area has the potential to significantly impact local BNLL populations.

Recommended Potentially Feasible Mitigation Measure(s)
Because suitable habitat for BNLL is present within the Project area, CDFW recommends conducting the following evaluation and including the following mitigation measures as conditions of approval.

Recommended Mitigation Measure 5: BNLL Surveys

Prior to initiating any vegetation- or ground-disturbance activities, CDFW recommends conducting surveys in accordance with the "Approved Survey Methodology for the Blunt-nosed Leopard Lizard" (CDFG 2004). This recommended survey protocol, designed to optimize BNLL detectability, reasonably assures CDFW that ground-disturbance will not result in take of this Fully Protected species.

CDFW advises completion of BNLL surveys no more than one year prior to initiation of ground disturbance. Please note that protocol-level surveys must be conducted on multiple dates during late spring, summer, and fall and that within these time periods there are specific protocol-level date, temperature, and time parameters which must be adhered to. In addition, the protocol requires that all survey days be complete within the same calendar year as one another. As a result, protocol-level surveys for BNLL are not synonymous with 30-day "preconstruction surveys" often recommended for other wildlife species. In addition, the BNLL protocol specifies different survey effort requirements based on whether the disturbance results from maintenance activities or if the disturbance results in habitat removal (CDFG 2004).

Recommended Mitigation Measure 6: BNLL Take Avoidance

BNLL detection during protocol level surveys warrants consultation with CDFW to discuss how to implement ground-disturbing activities and avoid take.

COMMENT 3: Tricolored blackbird (TRBB)

Issue: The EDA states that a 2010 field study identified nesting TRBB (*Agelaius tricolor*), a species listed as State Threatened pursuant to CESA, along the western border of the east retention basin within the Project site, but also acknowledges that impacts to TRBB were not analyzed in the previous CEQA document. In addition, the EDA states that construction near the east retention basin is not proposed under the permit renewal, but that ground disturbance from a well installation will occur in the vicinity.

Specific impact: Without appropriate avoidance and minimization measures for TRBB, potential significant impacts associated with Project development include nest and/or colony abandonment, reduced reproductive success, and reduced health and vigor of eggs and/or young.

Evidence impact would be significant: As mentioned above, the EDA indicates that the Project area has historically supported suitable nesting substrate for TRBB and is comprised of suitable foraging habitat for the species, increasing the likelihood of occurrence. TRBB aggregate and nest colonially, forming colonies of up to 100,000 nests (Meese et al. 2014). Increasingly, TRBB are forming larger colonies that contain progressively larger proportions of the species' total population (Kelsey 2008). In 2008, for example, 55% of the species' global population nested in only two colonies (Kelsey 2008). Nesting can occur synchronously, with all eggs laid within one week (Orians 1961). For these reasons, depending on timing, disturbance to nesting colonies can cause abandonment, significantly impacting TRBB populations (Meese et al. 2014).

Recommended Potentially Feasible Mitigation Measure(s)
To evaluate potential impacts to TRBB, CDFW recommends conducting the following evaluation of the Project area and including the following mitigation measures as conditions of approval.

Recommended Mitigation Measure 7: TRBB Habitat Assessment

CDFW recommends that a qualified biologist conduct a habitat assessment of the Project area in advance of any vegetation- or ground-disturbing activities to determine if the Project area or its vicinity contains suitable habitat for TRBB.

Recommended Mitigation Measure 8: TRBB Surveys

CDFW recommends that vegetation- or ground-disturbing activities be timed to avoid the typical bird breeding season (February 1 through September 15). However, if Project activities must take place during that time, and suitable TRBB habitat is detected during habitat assessments, CDFW recommends that a qualified wildlife biologist conduct surveys for nesting TRBB no more than 10-days prior to the start of implementation to evaluate presence/absence of TRBB nesting colonies in proximity to Project activities and to evaluate potential Project-related impacts.

Recommended Mitigation Measure 9: TRBB Avoidance

If an active TRBB nesting colony is found during preconstruction surveys, CDFW recommends implementation of a minimum 300-foot no-disturbance buffer in accordance with CDFW's "*Staff Guidance Regarding Avoidance of Impacts to Tricolored Blackbird Breeding Colonies on Agricultural Fields in 2015*" (CDFW 2015). CDFW advises that this buffer remain in place until the breeding season has ended or until a qualified biologist has determined that nesting has ceased, the birds have fledged, and are no longer reliant upon the colony or parental care for survival. It is important to note that TRBB colonies can expand over time and for this reason, the colony may need to be reassessed to determine the extent of the breeding colony within 10-days of Project initiation.

Recommended Mitigation Measure 10: TRBB Take Authorization

In the event that a TRBB nesting colony is detected during surveys, consultation with CDFW is warranted to discuss how to implement the Project and avoid take, or if avoidance is not feasible, to acquire an ITP, pursuant to Fish and Game Code Section 2081(b), prior to any ground-disturbing activities.

COMMENT 4: Burrowing Owl (BUOW)

Issue: BUOW have been documented to occur in the vicinity of the KHF (CDFW 2019). Review of aerial imagery reveals that suitable habitat for BUOW is present both within and in the vicinity of the KHF. BUOW inhabit open grassland containing small mammal burrows, a requisite habitat feature used by BUOW for nesting and cover. Habitat both within and bordering the KHF, supports grassland habitat. Therefore, there is potential for BUOW to occupy or colonize the KHF.

Specific impact: Potentially significant direct impacts associated with ground disturbing activities include burrow collapse, inadvertent entrapment, nest abandonment, reduced reproductive success, reduction in health and vigor of eggs and/or young, and direct mortality of individuals.

Evidence impact is potentially significant: BUOW rely on burrow habitat year-round for their survival and reproduction. Habitat loss and degradation are considered the greatest threats to BUOW in California's Central Valley (Gervais et al. 2008). Therefore, ground-disturbing activities associated with the Project have the potential to significantly impact local BUOW populations. In addition, and as described in CDFW's "*Staff Report on Burrowing Owl Mitigation*" (CDFG 2012), excluding and/or evicting BUOW from their burrows is considered a potentially significant impact under CEQA.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact)
To evaluate potential impacts to burrowing owl associated with the Project, CDFW recommends conducting the following evaluation of the Project area and including the following mitigation measures as conditions of approval.

Recommended Mitigation Measure 11: BUOW Surveys

CDFW recommends assessing presence/absence of BUOW by having a qualified biologist conduct surveys following the California Burrowing Owl Consortium's (CBOC) "*Burrowing Owl Survey Protocol and Mitigation Guidelines*" (CBOC 1993) and CDFW's *Staff Report on Burrowing Owl Mitigation*" (CDFG 2012). Specifically, CBOC and CDFW's Staff Report suggest three or more surveillance surveys conducted during daylight with each visit occurring at least three weeks apart during the peak breeding season (April 15 to July 15), when BUOW are most detectable. In addition, CDFW advises that surveys include a 500-foot buffer around the Project area.

Recommended Mitigation Measure 12: BUOW Avoidance

Should a BUOW be detected, CDFW recommends no-disturbance buffers, as outlined in the "*Staff Report on Burrowing Owl Mitigation*" (CDFG 2012), be implemented prior to and during any ground-disturbing activities. Specifically, CDFW's Staff Report recommends that impacts to occupied burrows be avoided in accordance with the following table unless a qualified biologist approved by CDFW verifies through non-invasive methods that either: 1) the birds have not begun egg laying and incubation; or 2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival.

Location	Time of Year	Level of Disturbance		
		Low	Med	High
Nesting sites	April 1-Aug 15	200 m*	500 m	500 m
Nesting sites	Aug 16-Oct 15	200 m	200 m	500 m
Nesting sites	Oct 16-Mar 31	50 m	100 m	500 m

* meters (m)

Recommended Mitigation Measure 13: BUOW Passive Relocation and Mitigation

If BUOW are found within these recommended buffers and avoidance is not possible, it is important to note that according to the Staff Report (CDFG 2012), exclusion is not a minimization or mitigation method and is considered a potentially significant impact under CEQA. However, if necessary, CDFW recommends that burrow exclusion be conducted by qualified biologists and only during the non-breeding season, before breeding behavior is exhibited and after the burrow is confirmed empty through non-invasive methods, such as surveillance. CDFW recommends replacement of occupied burrows with artificial burrows at a ratio of 1 burrow collapsed to 1 artificial burrow constructed (1:1) as mitigation for the potentially significant impact of evicting BUOW. Because BUOW may attempt to colonize or re-colonize an area that will be impacted; thus, CDFW recommends ongoing surveillance, at a rate that is sufficient to detect BUOW if they return.

COMMENT 5: American Badger

Issue: American badger have been documented to occur in the vicinity of the KHF (CDFW 2019). American badger can occupy a diversity of habitats and requires sufficient food, friable soils, and open, uncultivated ground (Williams 1986).

Specific impact: Without appropriate avoidance and minimization measures for American badger, potentially significant impacts associated with ground disturbance

include natal den abandonment, which may result in reduced health or vigor of young, or direct mortality.

Evidence impact is potentially significant: Habitat loss is a primary threat to American badger (Gittleman et al. 2001). The Project area is within the range of American badger and suitable habitat may be present on or in the vicinity of the Project area. As a result, Project activities have the potential to significantly impact local populations of American badger.

Recommended Potentially Feasible Mitigation Measure(s)
To evaluate potential impacts to American badger associated with the Project, CDFW recommends conducting the following evaluation of the Project area and including the following mitigation measures as conditions of approval.

Recommended Mitigation Measure 14: American Badger Habitat Assessment

CDFW recommends that a qualified biologist conduct a habitat assessment in advance of any vegetation- or ground-disturbing activities, to determine if the Project area or its immediate vicinity contain suitable habitat for American badger.

Recommended Mitigation Measure 15: American Badger Surveys

If suitable habitat is present, CDFW recommends that a qualified biologist conduct focused surveys for American badger and their requisite habitat features (dens) to evaluate potential impacts resulting from ground- and vegetation-disturbance.

Recommended Mitigation Measure 16: American Badger Avoidance

Avoidance whenever possible is encouraged via delineation and observation of a 50-foot no-disturbance buffer around dens until it is determined through non-invasive means that individuals occupying the den have dispersed.

II. Editorial Comments and/or Suggestions

Nesting birds: CDFW encourages Project implementation occur during the bird non-nesting season. However, if ground-disturbing activities must occur during the breeding season (February through mid-September), the Project's applicant is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Codes as referenced above.

To evaluate Project-related impacts on nesting birds, CDFW recommends that a qualified wildlife biologist conduct pre-activity surveys for active nests no more than

10-days prior to the start of ground disturbance to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around the work site to identify nests and determine their status. A sufficient area means any area potentially affected by the Project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. Prior to initiation of construction activities, CDFW recommends a qualified biologist conduct a survey to establish a behavioral baseline of all identified nests. Once construction begins, CDFW recommends a qualified biologist continuously monitor nests to detect behavioral changes resulting from the Project. If behavioral changes occur, CDFW recommends the work causing that change cease and CDFW consulted for additional avoidance and minimization measures.

If continuous monitoring of identified nests by a qualified wildlife biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250-feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. Variance from these no disturbance buffers is possible when there is compelling biological or ecological reason to do so, such as when the construction area would be concealed from a nest site by topography. CDFW recommends that a qualified wildlife biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database that may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be mailed electronically to CNDDB at the following electronic mail address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

FILING FEES

The Project, as proposed, has the potential to impact fish and/or wildlife, and assessment of filing fees may be necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental

review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

CONCLUSION

CDFW appreciates the opportunity to comment on the EDA to assist the DTSC in identifying and mitigating subsequent project's impacts on biological resources.

Should you have questions regarding this letter or for further coordination please contact Jennifer Giannetta, Environmental Scientist, at the address provided on this letterhead, by telephone at (559) 243-4014 extension 216, or by electronic mail at Jennifer.Giannetta@wildlife.ca.gov.

Sincerely,

Julie A. Vance
Regional Manager

REFERENCES

California Burrowing Owl Consortium (CBOC), 1993. Burrowing owl survey protocol and mitigation guidelines. Pages 171-177 *in* Lincer, J. L. and K. Steenhof (editors). 1993. The burrowing owl, its biology and management. Raptor Research Report Number 9.

California Department of Fish and Game (CDFG), 2004. Approved Survey Methodology for the Blunt-nosed Leopard Lizard. California Department of Fish and Game, May 2004.

CDFG, 2012. Staff Report on Burrowing Owl Mitigation. California Department of Fish and Game. March 7, 2012.

California Department of Fish and Wildlife (CDFW), 2015. Staff Guidance Regarding Avoidance of Impacts to Tricolored Blackbird Breeding Colonies on Agricultural Fields in 2015. March 19, 2015.

CDFW, 2019. Biogeographic Information and Observation System (BIOS). https://www.wildlife.ca.gov/Data/BIOS. Accessed June 24, 2019.

Endangered Species Recovery Program (ESRP), 2019. Blunt-nosed leopard lizard. http://esrp.csustan.edu/speciesprofiles/profile.php?sp=gasi. Accessed June 24, 2019.

Gervais, J. A., D. K. Rosenberg, and L. A. Comrack, 2008. Burrowing Owl (*Athene cunicularia*) *In* California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California (W. D. Shuford and T. Gardali, editors). Studies of Western Birds 1. Western Field Ornithologists, Camarillo, California, and California Department of Fish and Game, Sacramento.

Gittleman, J. L., S. M. Funk, D. MacDonald, and R. K. Wayne, 2001. Carnivore conservation. Cambridge University Press, Cambridge, United Kingdom.

Kelsey, R., 2008. Results of the tricolored blackbird 2008 census. Report submitted to U.S. Fish and Wildlife Service, Portland, OR, USA.

Meese, R. J., E. C. Beedy, and W. J. Hamilton, III, 2014. Tricolored blackbird (Agelaius tricolor), The Birds of North America (P. G. Rodewald, Ed.). Ithaca: Cornell Lab of Ornithology; Retrieved from the Birds of North America: https://birdsna-org.bnaproxy.birds.cornell.edu/Species-Account/bna/species/tribla. Accessed December 15, 2017.

Orians, G. H., 1961. The ecology of blackbird (*Agelaius*) social systems. Ecological Monographs 31(3): 285–312.

U. S. Fish and Wildlife Service (USFWS), 1998. Blunt-nosed leopard lizard *In* Recovery Plan for Upland Species of the San Joaquin Valley, California. Region 1, Portland, OR. 319 pp.